



United States Department of the Interior

FISH AND WILDLIFE SERVICE
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December 17, 2009

Michael Ribordy, On-Scene Coordinator
U.S. Environmental Protection Agency
Region 5
77 West Jackson Boulevard (SR-6J)
Chicago, IL 60604-3507

James Saric, Remedial Project Manager
U. S. Environmental Protection Agency
Region 5
77 West Jackson Boulevard (SR-6J)
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US EPA RECORDS CENTER REGION 5



Re: Draft Construction Completion Report (CCR) dated August, 2009, for the Former Plainwell Impoundment Time Critical Removal Action (TCRA)

Dear Mr. Ribordy and Mr. Saric,

This letter is written on behalf of the Trustees for the Kalamazoo River Natural Resource Damage Assessment (NRDA) related to the Allied Paper Inc./Portage Creek/Kalamazoo River Superfund Site and is for the purpose of commenting on the CCR referred to above.

The Trustees include representatives from three governmental entities: the State of Michigan, the National Oceanic and Atmospheric Administration of the U.S. Department of Commerce, and the U. S. Fish and Wildlife Service of the U. S. Department of the Interior. The Trustees are authorized, pursuant to the CERCLA Section 107 and the NCP, to consult with EPA on remedial activities affecting trust natural resources and to pursue NRDA's for injuries caused by the release of hazardous substances.

The Trustees have reviewed the draft CCR and agree, in large part, with the comments on it submitted to you by the Michigan Department of Environmental Quality in a December 1, 2009, letter from Paul Bucholtz, Remediation and Redevelopment Division (the Letter). The Letter describes the concern that the stable river channel design has not yet been achieved. This is resulting in the loss of the 30 foot cut-back and, in some locations, bank failure with resulting residual exposure. The original design did not predict erosion patterns with complete accuracy and significant additional rock armoring has been added to the project since design. Without better predictions of what is needed for stable banks within the system, restoration activities of concern to the Trustees are at risk.


In particular, the Trustees agree with the comments numbered 11, 17, 19, and 20 in the Letter. Design, construction, re-vegetation, adaptive management, and maintenance activities intended to lead to a stable river channel that does not rely on extensive hard armoring (and are thus consistent with natural channel

design principles) must be carefully evaluated and understood in order to more accurately inform future work on the river. Therefore, the additional descriptions suggested in the Letter will provide critically important information for improving the efficiency and effectiveness of response actions as work progresses down the river. Project cost details are also important and should be included in the CCR.

The Trustees also wish to emphasize our agreement with comment 9 in the Letter. In § 3.5.2.1 of the CCR, at page 3-22, the sentence that now reads "At the discretion of ARCADIS, near-shore sediments were over-excavated to remove sediments located between the neat line and pre-impoundment river bottom" should be replaced with the following, more accurate statement: "As agreed to by all parties, additional material was removed in some areas to more closely approximate the actual parent bed material."

Finally, the Trustees concur that it is not possible to fully evaluate the success of the project until, at the earliest, the completion of the monitoring period, including collection and evaluation of monitoring data. As the Trustees proposed to Mr. Saric in an October 1, 2009, e-mail, a critical next step in cleaning up and restoring the Kalamazoo River is a formal "lessons-learned" exercise that includes EPA, MDEQ, the Trustees, MDNR land managers, Georgia-Pacific/Arcadis and other river experts.

Sincerely,



Lisa L. Williams

For the Kalamazoo River Natural Resource Trustees

cc: Judith Alfano, MDEQ
Paul Bucholtz, MDEQ
Sharon Hanshue, MDNR
Polly Synk, MDAG
Todd Goeks, NOAA
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